

ESCANDON, FERNICOLA, ANDERSON, COVELLI & MCPHERSON  
ATTORNEYS AT LAW



25 West 8<sup>th</sup> Street  
Bayonne, New Jersey, 07002

301 Main Street, Suite 3  
Allenhurst, New Jersey 07711  
Tel: 732- 663-1920 • Fax: 732- 663-0011  
•Reply to Allenhurst office

204 Court House Lane, Suite 202  
Toms River, New Jersey, 08753

ROBERT C. FERNICOLA  
[rfernicola@efalawfirm.com](mailto:rfernicola@efalawfirm.com)

ROBERT M. ANDERSON\*†  
[randerson@efalawfirm.com](mailto:randerson@efalawfirm.com)

VICTOR M. COVELLI\*\*  
[vcovelli@efalawfirm.com](mailto:vcovelli@efalawfirm.com)

SCOTT M. MCPHERSON•  
[smcpherson@efalawfirm.com](mailto:smcpherson@efalawfirm.com)

BERNARD P. ESCANDON  
1914 – 1996

WADE T. BALDWIN  
[wbaldwin@efalawfirm.com](mailto:wbaldwin@efalawfirm.com)

MICHAEL F. O'CONNOR  
OF COUNSEL

DAVID J. LABIB  
OF COUNSEL

May 4, 2020

VIA E-FILING

Hon. Zahid N. Quarishi, U.S.M.J.  
U. S. District Court  
Clarkson S. Fisher Federal Bldg. & U. S. Courthouse  
402 E. State Street  
Trenton, NJ 08608

**Re: Miquenel Altidor vs. Toms River Police Dept., et al**  
**Case 3:18-cv-14834-MAS-DEA**  
**Our File #14864**

Dear Judge Quaraishi:

Please be advised that my office represents Plaintiff, Miquenel Altidor with respect to the above captioned matter. The fact discovery deadline expires on May 29, 2020 and it is respectfully submitted that due to the delays caused by COVID-19 that same will need to be extended. I have conferred with my adversary and we agree that a ninety (90) day extension would be helpful. We would be glad to discuss same with Your Honor in a telephonic case management conference.

Thank you for Your Honor's time and consideration.

Very truly yours,

/s/ROBERT M. ANDERSON

RMA/crw

cc: Thomas E. Monahan, Esq. (via e-Filing)